

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MICHAEL A. LEE, JR.,

Plaintiff,

v.

Case No. 2:22-CV-00930

GINA AMBASAN,

Defendant.

**DEFENDANT'S ANSWERS TO PLAINTIFF'S
SECOND SET OF WRITTEN INTERROGATORIES**

Defendant, Gina Ambasan, by her attorneys, Devine Hahn, S.C., answers plaintiff's Second Set of Written Interrogatories as follows:

INTERROGATORY NO. 12 (sic): Identify all persons whom you talked with about your interactions with Plaintiff Michael Lee from February 1, 2018 through September 25, 2023.

Answer. Objection. This interrogatory seeks information protected from disclosure attorney-client privilege. *See Upjohn co. v. United States*, 449 U.S. 383, 101 S. Ct. 677, 66 L. Wd. 2d 584 (1981). Moreover, Consultant Experts are not discoverable unless warranted under FRCP 26(b)(1) or FRCP 26(b)(3)(A)(ii). Experts who will testify at trial, if any, will be disclosed pursuant to the scheduling order.

Subject to our objections, and without waiving the same. If interactions are meant to be what is alleged in the complaint – no one.

INTERROGATORY NO. 13: Please identify all of your personal phone numbers that you had from February 1, 2018, through May 20, 2020.

Answer. 262-930-0972.

INTERROGATORY NO. 14: Please explain all of your job duties as a Correctional Officer from February 1, 2018, through May 20, 2020.

Answer. Objection. This interrogatory is vague, ambiguous, and overly broad and cannot reasonably be answered as a narrative answer.

Subject to our objection, and without waiving the same manage inmates, search for contraband.

INTERROGATORY NO. 15: Please explain all of the training that you have had with regards to the Prison Rape Elimination Act (PREA) from January 1, 2017 through January 1, 2023.

Answer. Objection. This interrogatory is vague, ambiguous, and overly broad and cannot reasonably be answered as a narrative answer.

Subject to our objection, and without waiving the same we were mandated to watch videos.

INTERROGATORY NO. 16: Please explain how and when your employment with the Department of Corrections ended.

Answer. Objection. This interrogatory is vague, ambiguous, and overly broad and cannot reasonably be answered as a narrative answer.

Subject to our objection, and without waiving the same I resigned due to mandatory 16 hours shifts. October 2020.

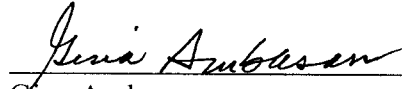
INTERROGATORY NO. 17:

Please provide an accounting of all of your tangible and intangible assets as of February 16, 2024. Such information should include any information regarding real estate and where located, cash, businesses owned, inherited property, automobiles, stocks bonds and other annuities, pensions or annuities.

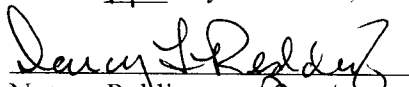
Answer. Objection. This interrogatory seeks the production of information that is not reasonably calculated to lead to discoverable evidence, and is therefore outside the scope of permissible discovery. FRCP 26(b)(1).

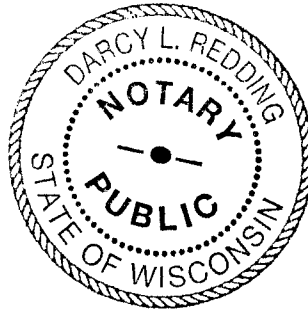
In light of this objection, no answer will be provided.

Dated March 14, 2024.


Gina Ambasan

Subscribed to and sworn before me
on this 14th day of March, 2024.


Notary Public, Racine County, WI
My commission expires 10-12-25



AS TO OBJECTIONS:

Dated the 14 day of March, 2024.

DEVINE HAHN, S.C.

By: 

Thomas M. Devine, No. 1017536
Attorney for Defendant,
Gina Ambasan

Mailing Address:
840 Lake Avenue, Suite 300
Racine, WI 53403
(262) 632-7541
(262) 364-2088 (fax)